

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	CASE NO. 22-01976/EAG
	*	
MIGUEL ANGEL RIVERA GARCIA	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS DOCKET NO. 57
AND IN COMPLIANCE WITH ORDER DOCKET NO. 59
RE: CURING PLAN ARREARS**

TO THE HONORABLE COURT:

NOW COMES, MIGUEL ANGEL RIVERA GARCIA, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. Before the Court there is a *Trustee's Motion to Dismiss* filed by the Chapter 13 Trustee, Docket No. 57.

2. On June 14, 2024, this Honorable Court granted the Debtor fourteen (14) days to file evidence of being current as per *Order*, due by 6/27/2024, Docket No. 59.

3. The Debtor respectfully submits that he has cured any and all arrears in his confirmed Plan payments to the Trustee. On June 11, 2024, June 12, 2024 and June 27, 2024, the Debtor made four (4) payments each in the sum of \$520.00 (money orders no's. 28974915145, 29055592263, 28537391452 and 28537391463), for a total amount paid in of \$2,080.00 to the Trustee. Attached is copy of payments made by the Debtor to the Trustee as evidence of curing all Plan arrears.

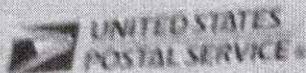
4. The Debtor respectfully submits that he is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to take note of said Plan payments and deny the *Trustee's Motion to Dismiss*, Docket No. 57, in the above captioned case.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion in compliance with *Order* dated June 14, 2024, Docket No. 59, in the above case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send sent notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor Miguel Angel Rivera Garcia, Urb Diamaris 330 Crisantemos Street, Juncos PR 00777.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 27th day of June, 2024.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 787-963-7699
Email: rfc@rfigueroalaw.com



CUSTOMER'S RECEIPT

SEE BACK OF THIS RECEIPT
FOR IMPORTANT CLAIM
INFORMATION

NOT
NEGOTIABLE

Pay to

Address

Jose R. Carrion Morales
Chapter 13 Trustee
#22-01976 / EAG 13

KEEP THIS
RECEIPT FOR
YOUR RECORDS

March
2024

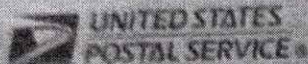
Year, Month, Day

Post Office

Amount

Clerk

Serial Number
28974915145



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April
2024

Year, Month, Day

Post Office

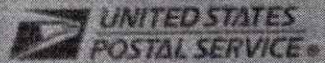
Amount

\$520.00

Clerk

09

Serial Number
29355592263



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#22-01976 / EAG 13

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May 2024

Year, Month, Day

Post Office

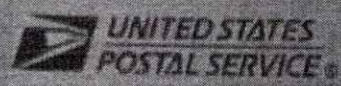
Amount

\$520.00

Clerk

02

Serial Number
28537391452



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NEGOTIABLE

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Jose R. Carrion Morales
Chapter 13 Trustee
#22-01976 / EAG 13

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June 2024

Year, Month, Day

Post Office

Amount

\$520.00

Clerk

02

Serial Number
28537391463